



U.S. Department of Justice

*United States Attorney
Eastern District of Wisconsin*

*Federal Courthouse
517 E. Wisconsin Ave, Rm 530
Milwaukee WI 53202*

*(414)297-1700
Fax (414) 297-1738
www.justice.gov/usao/wie*

October 7, 2021

Honorable J.P. Stadtmueller
United States District Judge
517 E. Wisconsin Avenue
Milwaukee, WI 53202

Re: United States v. Karmo, Case No. 20-CR-170

Dear Judge Stadtmueller:

The United States submits this letter to request that the Court schedule a status conference, at which a trial date can be selected.

The United States bases this request on the following facts. During a status conference on July 8, 2021, counsel for Mr. Karmo requested additional time to file a plea agreement with the Court. *See* Dkt. No. 64. The Court set a filing deadline of July 16, 2021. *See id.* On August 11, 2021, counsel for Mr. Karmo filed a letter, indicating that although he had received a signed agreement from his client, the agreement contained handwritten modifications that were not contemplated by counsel. *See* Dkt. No. 65. Mr. Karmo's counsel explained that this development led to additional plea negotiations and that the defense would return a signed plea agreement after the conclusion of a lockdown at the Dodge County Detention Facility. *See id.*

After receiving the August 11, 2021, filing, counsel for the United States contacted counsel for Mr. Karmo on multiple occasions to inquire as to the status of the agreement. Ultimately, on September 29, 2021, the United States received a signed plea agreement from Mr. Karmo. However, Mr. Karmo again included unanticipated and unacceptable handwritten modifications. As such, no agreement has been reached.

Based on the above, the United States requests that the Court conduct a status conference for the purpose of setting a trial schedule.

Respectfully submitted,

s/Richard G. Frohling
Acting United States Attorney
s/Margaret B. Honrath
Deputy Criminal Chief

Attorneys for Plaintiff